

Matthew I. Knepper, Esq.
Nevada Bar No. 12796
Miles N. Clark, Esq.
Nevada Bar No. 13848
Shaina R. Plaksin, Esq.
Nevada Bar No. 13935
KNEPPER & CLARK LLC
5510 So. Fort Apache Rd, Suite 30
Las Vegas, NV 89148
Phone: (702) 856-7430
Fax: (702) 447-8048
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com
Email: shaina.plaksin@knepperclark.com

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Las Vegas, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: dkrieger@hainesandkrieger.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CLYDE C. GIVENS,
Plaintiff,

vs.

SETERUS, INC.; EQUIFAX INFORMATION
SERVICES, LLC; and TRANS UNION LLC,
Defendants.

Case No.: 2:19-cv-01009-RFB-BNW

**JOINT MOTION TO EXTEND TIME TO
FILE STIPULATION OF DISMISSAL OF
TRANS UNION LLC**

[FOURTH REQUEST]

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JOINT MOTION TO EXTEND TIME TO FILE STIPULATION OF DISMISSAL OF TRANS UNION LLC
[FOURTH REQUEST] - 1

1 Plaintiff Clyde C. Givens (“Plaintiff”) and Defendant Trans Union LLC; (“Trans Union”
2 or “Defendant”) (collectively, the “Parties”), by and through their counsel of record, hereby move
3 jointly to extend their deadline to file a Stipulation of Dismissal of Trans Union forty-five (45)
4 days:
5

6 1. The Parties settled this matter on July 11, 2019. [ECF Dkt. 8]

7 2. Per the Court’s Minute Order, on July 12, 2019, Plaintiff’s Stipulation of Dismissal of
8 Trans Union was due August 26, 2019. [ECF Dkt. 9]

9 3. On August 22, 2019, the Court granted the Parties’ stipulation to extend the time to
10 file the dismissal of Trans Union. [ECF Dkt. 20]

11 4. On October 3, 2019, the Court granted the Parties’ stipulation to extend the time to
12 file the dismissal of Trans Union. [ECF Dkt. 31]

13 5. On November 12, 2019, the Court granted the Parties’ stipulation to extend the time
14 to file the dismissal of Trans Union. [ECF Dkt. 44]

15 6. The stipulation of dismissal of Trans Union is due on December 23, 2019.

16 7. Although the Parties reached a general agreement on the terms of settlement in July
17 2019, one term of the settlement then required further discussion, which was resolved mid-
18 September 2019. Since then, however, Trans Union has not provided a draft settlement agreement to
19 Plaintiff for review, despite many inquiries by Plaintiff, including on October 7, 2019; October 16,
20 2019; November 6, 2019; November 27, 2019; December 3, 2019; December 11, 2019; and
21 December 12, 2019.

22 8. As such, the Parties are still working on finalizing their Settlement Agreement.

23 9. The Parties request an extension of forty-five days to file their Stipulation of Dismissal
24 of Trans Union to allow them additional time to finalize the Settlement Agreement.

25 JOINT MOTION TO EXTEND TIME TO FILE STIPULATION OF DISMISSAL OF TRANS UNION LLC
26 [FOURTH REQUEST] - 2
27
28

1 10. Plaintiff agrees to file the Stipulation of Dismissal of Trans Union no later than
2 **February 6, 2020.**

3
4 DATED December 20, 2019.

5 **KNEPPER & CLARK LLC**

6 /s/ Shaina R. Plaksin

7 Matthew I. Knepper, Esq.
8 Nevada Bar No. 12796
9 Miles N. Clark, Esq.
10 Nevada Bar No. 13848
11 Shaina R. Plaksin, Esq.
12 Nevada Bar No. 13935
13 5510 So. Fort Apache Rd, Suite 30
14 Las Vegas, NV 89148
15 Email: matthew.knepper@knepperclark.com
16 Email: miles.clark@knepperclark.com
17 Email: shaina.plaksin@knepperclark.com

18 **HAINES & KRIEGER LLC**

19 David H. Krieger, Esq.
20 Nevada Bar No. 9086
21 8985 S. Eastern Avenue, Suite 350
22 Las Vegas, NV 89123
23 Email: dkrieger@hainesandkrieger.com

24 *Counsel for Plaintiff*

5 **ALVERSON TAYLOR & SANDERS**

6 /s/ Trevor Waite

7 Kurt R. Bonds, Esq.
8 Nevada Bar No. 6228
9 Trevor Waite, Esq.
10 Nevada Bar No. 13779
11 6605 Grand Montecito Parkway, Suite 200
12 Las Vegas, NV 89149
13 Email: kbonds@alversontaylor.com
14 Email: twaite@alversontaylor.com

15 *Counsel for Defendant*
16 *Trans Union LLC*

17
18 **ORDER GRANTING**

19 **EXTENSION OF TIME FOR PARTIES TO FILE STIPULATION OF DISMISSAL OF**
20
21 **TRANS UNION LLC**

22 **IT IS SO ORDERED.**

23 
24 **RICHARD F. BOULWARE, II**
25 **UNITED STATES DISTRICT JUDGE**

26 DATED this 26th day of December, 2019.